

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

RIGI KOPF, LLC, a Florida limited liability  
company,

Plaintiff,

v.

SKYBRIDGE MIAMI, LLC, a Delaware  
Limited Liability Company, FELIPE  
MONROY TORRES, individually, ARIEL  
ZEEV PICKER SCHATZ, individually,  
BOBE HOLDINGS LIMITED  
PARTNERSHIP, a Prince Edward Island  
(Canada) Limited Partnership, and OLGA  
SCHATZ SKVIRSKY, individually,

Defendants.

Case No.: 1:23-cv-24079-FAM

**DEFENDANT SKYBRIDGE MIAMI, LLC'S REMOVAL STATUS REPORT AND  
CERTIFICATION THAT ALL RECORDS AND PLEADINGS IN THE STATE COURT  
PROCEEDINGS HAVE BEEN FILED**

Defendant, Skybridge Miami, LLC ("Skybridge"), by and through undersigned counsel and pursuant to the Notice of Court Practice in Removal Cases filed on October 31, 2023 [ECF No. 5], hereby certifies that it has filed copies of all records and pleadings in the state court proceeding,<sup>1</sup> and files this Removal Status Report as follows:

---

<sup>1</sup> Copies of all records and pleadings in the state court proceedings were attached to Skybridge's Notice of Removal at Exhibit 2 [ECF No. 1-2]. The only state court filing which was not previously included at ECF No. 1-2 is the Notice of Removal filed in state court, which attached the Notice of Removal filed in the District Court. For completion, the Notice of Removal filed on the state court docket is attached hereto as **Exhibit A**.

**I. A Plain Statement of the Nature of the Claim and any Counterclaim, Cross-Claim, or Third-Party claim, Made in State or Federal Court Including the Amount of Damages Claimed and Any Other Relief Sought.**

Plaintiff has asserted a cause of action against the Defendants for alleged material misrepresentation, fraud in the inducement, fraud based on nondisclosure, declaratory relief, and breach of contract. Plaintiff has asserted damages in excess of \$750,000.00. Plaintiff also seeks a declaration from the Court regarding its rights, powers, privileges, and/or immunities as it relates to a loan made. *See* (Compl. at ¶14 and Counts I-V) [ECF No. 1-1].

**II. A Plain Statement of the Grounds for Removal and a Listing of All Parties to the Action, Including Parties to Any Third-Party Claim.**

As set forth in Skybridge's Notice of Removal, this action is one of a civil nature over which this Court has original subject matter jurisdiction under 28 U.S.C. § 1332(a). The parties are diverse and the amount in controversy requirement is satisfied. *See* 28 U.S.C. §§ 1441(a), 1446(a). The case was removable to this, the United States District Court for the Southern District of Florida, as this is the District Court for the district and division embracing the place where the State Court Action was pending. [ECF No. 1 at ¶5].

The Plaintiff is Rigi Kopf, LLC, a Florida Limited Liability Corporation with citizenship in Florida for diversity jurisdiction purposes. *Silver Crown Invs., LLC v. Team Real Estate Mgmt., LLC*, 349 F. Supp. 3d 1316, 1324 (S.D. Fla. 2018) (citing *Rolling Greens MPH, L.P. v. Comcast SCH Holdings, LLC*, 374 F. 3d 1020, 1022 (11th Cir. 2004)) [ECF No. 1 at ¶ 8].

The Defendants are Skybridge Miami, LLC, Felipe Monroy Torres, Ariel Zeev Picker Schatz, Olga Schatz Skvirsky, and Bobe Holdings LP, each of whom are citizens of Mexico City, Mexico for diversity jurisdiction purposes. *See Makozy v. Zimmerer*, 850 Fed. Appx. 722, 724 (11th Cir. 2021); *Silver Crown*, 349 F. Supp. 3d at 1324; *Rolling Greens MPH, L.P.*, 374 F. 3d at 1021. [ECF No. 1 at ¶¶ 2-4, 9-10].

**III. A List of All Pending Motions.**

There are no pending motions in this action at the time of this filing.

**IV. A Brief Statement by Each Defendant Explaining Whether or Not Each Has Joined the Notice of Removal.**

Defendants, Felipe Monroy Torres, Ariel Zeev Picker Schatz, Olga Schatz Skvirsky, and Bobe Holdings LP, were served after this case was removed by Skybridge. On November 7, 2023, these Defendants returned waivers of service to Plaintiff pursuant to Federal Rule of Civil Procedure 4(d). Each of these latter served Defendants consent to removal.

**V. State Whether the Defendant Has Removed the Action Within 30 Days After the Receipt by the Defendant of a Copy of the Initial Pleading Setting Forth the Claim for Relief Upon Which Such Action or Proceeding is Based.**

Defendant, Skybridge was served with the Complaint and Summons on October 6, 2023, and filed its Notice of Removal on October 26, 2023. Therefore, Skybridge removed within 30 days of receipt of a copy of Plaintiff's initial pleading and removal was timely.

Respectfully submitted,

**GREENBERG TRAURIG, P.A.**

Attorneys for Defendant  
333 S.E. 2nd Avenue, Suite 4400  
Miami, Florida 33131  
305-579-0500 Telephone  
305-961-5307 Facsimile

By: s/Michael N. Kreitzer

**MICHAEL N. KREITZER**

Florida Bar No. 705561

[kreitzerm@gtlaw.com](mailto:kreitzerm@gtlaw.com)

[moisem@gtlaw.com](mailto:moisem@gtlaw.com)

[flservice@gtlaw.com](mailto:flservice@gtlaw.com)

**JENNIFER JUNGER**

Florida Bar No. 125853

[jungerj@gtlaw.com](mailto:jungerj@gtlaw.com)

[fernandezfe@gtlaw.com](mailto:fernandezfe@gtlaw.com)

**PHILLIP M. SOVEN**

Florida Bar No. 1035504

[phil.soven@gtlaw.com](mailto:phil.soven@gtlaw.com)  
[moisem@gtlaw.com](mailto:moisem@gtlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on November 9, 2023, I caused to be served a copy of the above document to the following by email:

**MSP Recovery Law Firm**  
2701 S. LeJeune Rd., 10<sup>th</sup> Floor  
Miami, FL 33134  
(305) 614-2222  
John H. Ruiz, Esq.  
Email: [jruiz@msprecoverylawfirm.com](mailto:jruiz@msprecoverylawfirm.com)  
[serve@msprecoverylawfirm.com](mailto:serve@msprecoverylawfirm.com)  
*Counsel for Plaintiff*

By: /s/ Michael N. Kreitzer  
Michael N. Kreitzer